

February 27, 2004

DOROTHY ZIMMERMAN
8703 54TH PLACE WEST
MUKILTEO WA 98275

Subject: Complaint filed against Aaron Reardon - PDC Case No. 04-290

Dear Ms. Zimmerman:

The Public Disclosure Commission staff has completed its investigation of your complaint received October 24, 2003, alleging that Aaron Reardon, a candidate for Snohomish County Executive, violated RCW 42.17.

Your complaint was reviewed in light of the following statute:

RCW 42.17.050 prohibits a candidate from knowingly establishing, using, directing, or controlling more than one political committee for the purpose of supporting that candidate during a particular election campaign.

You alleged that Aaron Reardon violated RCW 42.17 by controlling more than one committee, specifically his campaign committee and Friends of Aaron/People for Ethical Government, an independent expenditure political committee that supported Aaron Reardon's candidacy for Snohomish County Executive.

We found that:

- Aaron Reardon registered what he called an "exploratory committee" in May of 2003 to look at the possibility of running for Snohomish County Executive. The activities were limited to meeting with Snohomish County officials, business and labor groups, and other citizens and citizen related organizations to discuss his viability as a candidate. No funds were solicited, received or spent in support of his candidacy during that "exploratory" timeframe. The C-1 listed a number of Campaign Co-chairs, including Liz Loomis. Senator Reardon indicated that sometime in June of 2003, he decided to formally announce his candidacy for Snohomish County Executive.

- On September 2, 2003, a political committee entitled Friends of Aaron Reardon filed a Committee Registration Statement (PDC Form C-1pc) with the PDC, registering as a political committee. The C-1pc indicated that the committee was formed to support "*Aaron Reardon for Snohomish County Executive*", and listed Young Ja Lee as the committee's only officer or principal. On September 11, 2003, Friends of Aaron Reardon filed an amended C-1pc, changing the committee name to People for Ethical Government.
- Ms. Lee stated under oath that she contacted Liz Loomis sometime around the middle of August of 2003, inquiring what she could do to assist Aaron Reardon in his campaign for Snohomish County Executive. As a legislator, Mr. Reardon had assisted the Lee family with a personal matter and the Lee family was interested in demonstrating their support. Ms. Loomis assisted and advised Ms. Lee, and informed her that she could form a committee independent of Aaron Reardon's campaign by forming an independent expenditure committee, and she suggested Ms. Lee consider hiring Christian Sinderman, a political consultant to do the work.
- Ms. Lee stated that she did not coordinate, consult or collaborate any of the activities undertaken by Friends of Aaron Reardon or People for Ethical Government with Aaron Reardon, or any agent or consultant of the Aaron Reardon Campaign. She went on to state the activities undertaken by Friends of Aaron Reardon were her own idea.
- Ms. Loomis stated that she was listed as a campaign Co-chair during the "exploratory period" of Aaron Reardon's campaign, and only considered herself a volunteer or supporter of the Reardon campaign. Ms. Loomis attended a Reardon campaign fund-raiser, co-hosted a campaign fund-raiser and door belled precincts within the City of Snohomish with literature from Aaron Reardon and candidates for Snohomish City Council. She went on to state she did not provide Aaron Reardon with any information regarding the activities being undertaken by Friends of Aaron Reardon/People for Ethical Government committee.
- Aaron Reardon stated under oath that he had no personal knowledge of the activities undertaken by Friends of Aaron Reardon/People for Ethical Government, and said he did not authorize or request that they undertake any activities on behalf of his candidacy. He stated that to the best of his knowledge, no one in his campaign had any involvement or knowledge about the activities being undertaken by the committee, and said he did not review or participate in any way in the development, production or distribution of the mail pieces generated by Friends of Aaron Reardon/People for Ethical Government.

- Aaron Reardon confirmed that Ms. Loomis had been listed as a campaign Co-chair during the “exploratory period” of his campaign, but said that once he formally announced his candidacy, her involvement was limited to co-hosting a fund raiser and door-belling precincts within the City of Snohomish with literature that included Mr. Reardon’s. Mr. Reardon indicated that Ms. Loomis was not a principal decision maker for his Snohomish County Executive race, that she did not attend campaign meetings, and she had no knowledge about the campaign’s mail plans.
- The Aaron Reardon Campaign retained the political consulting services of Terry Thompson for the 2003 campaign for Snohomish County Executive. Mr. Thompson stated that he had worked on a number of Aaron Reardon’s prior campaigns, and was a general consultant for the 2003 campaign, focusing on the campaign direct mail plan, including voter contact and message development.
- Mr. Thompson stated that he frequently spoke with Mr. Reardon over the phone during the course of the campaign providing him with “general advice and strategy as the campaign evolved”. He stated to the best of his knowledge, he remembered Ms. Loomis from a campaign kick-off event, but did not have any discussions with her about Aaron Reardon’s campaign, and stated she was not involved with any of the campaign plans or strategies that he was coordinating.

No evidence was found that Aaron Reardon or an agent of his campaign either controlled, consulted, collaborated or otherwise had knowledge of the activities undertaken by the Friends of Aaron Reardon/People for Ethical Government Committee.

After a careful review of the alleged violations and relevant facts, we have concluded our investigation and, with the concurrence of the Chair of the Public Disclosure Commission, I am dismissing your complaint against Aaron Reardon.

If you have questions, please contact Phil Stutzman, Director of Compliance, at (360) 664-8853 or toll free at 1-877-601-2828.

Sincerely,

Vicki Rippie
Executive Director

c: Aaron Reardon